

From: Rand Crafts
To: Milka Radulovic
Date: Monday, October 29, 2001 6:13:43 PM
Subject: Re: Oooops- new AO draft

Milka,

Our comments:

On Page 5, Item # 5, the words "and the" should be placed between "coal handling" and "cooling towers" dropping the comma.

On Page 10, Section II. Emission summary, you might label the last column as "Projected" Total Future Actual Emissions.

Also, on this same Table, please remove any references to decreases in emissions, such as Be and H2SO4, making them zero.

On the top of Page 11, I'm not sure what you would like here. Since neither IPSC nor the State have the historical modeling data, I guess we can presume that the current PTE is close to what I calculated earlier as applicable. But the key is to show that there will be no increase in PTE for any pollutant. (Our intent, anyway.) The same figures would be used at the Table on the last page of the AO. Since the PTE will be listed on Page 21, could it just be referenced from here instead? Just a thought.

The next Table on Page 11 entitled Plant Emission Summary is new also. I will provide the figures for this separately, but again appears to be redundant to the Table on Page 10. Could this substitute for the other?

At the bottom of Page 11, under Section III., it states that "There will be no new emission point.....". This is incorrect in light of the new helper cooling towers. Although total cooling tower emissions will not change, the helper towers will be new, as you've shown on Page 16 as item TTT.

On Page 16, Condition 9, per our discussion, we would like to see dual limits, with the new ones becoming effective at increased heat input or completion of modifications. (See my e-mail to you on 9/26/01.)

On Page 17, in Item F., for PM10, please note that we are required to use Method 5B, wet stack, no condensibles (since we are measuring SO2 aerosols anyway). You could leave the language that we would test condensibles if required by the Executive Secretary, but not for compliance. ✓

On Page 18, Condition 11., for clarity it might read better to state that we must calculate by January 20th the data for "the previous calendar year" to match the wording of the condition.

On Page 19, Condition 14, it refers to haul road speeds. Since our fugitive dust plan does not specify speeds for all roads, the last sentence might enforce better as "Any haul road speeds established in the Plan shall be posted."

On Page 19, Condition 16, the last sentence should include the word "oil" after "used."

On Page 20, Condition 23, you specify rolling 12 month periods. This will be difficult given seasonal variations. I think keeping this on a calendar year basis (as we already report) will be appropriate. Basically, we envisioned our annual emissions inventories would be used to indicate compliance. ✓

Also in Condition 23, is it possible to use a "screening" to show compliance? We discussed earlier a quick and dirty method of screening compliance with WEPCO using historical variations or fluctuations. If we fell